

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

UNITED STATES OF AMERICA,)	
)	
Plaintiff,)	
)	
v.)	No. 14 CR 00333
)	
MARC DAVIS,)	
)	
Defendant.)	

MOTION FOR EARLY TERMINATION OF MANDATORY SUPERVISED RELEASE

NOW COMES the defendant, Marc Davis, by and through his attorney, Richard S. Kling, and respectfully moves this Court to terminate his supervised release. In support of this motion, the defendant states the following:

1. On March 31, 2016, Marc Davis was convicted of conspiracy to possess and distribute a controlled substance and on March 31, 2016, sentenced to 30 months of incarceration followed by 3 years of mandatory supervised release which began August 16, 2016.
2. Since being released and placed on MSR, Mr. Davis has complied with all conditions of his supervised release. The Probation Department has never had to file a violation report in this case.
3. Under 18 U.S.C. §3583(e)(1), this Court has the discretion to terminate supervised release after a defendant has served one year of the total term, if termination is warranted by the defendant's conduct and is in the interests of justice. Mr. Davis respectfully submits that termination is warranted in this case based upon his exemplary conduct and compliance with all conditions of his supervision.
4. Counsel has spoken with his supervising U.S.P.O., who confirms that he has had no problems with Mr. Davis during his sentence and recommends him for early termination.

WHEREFORE, for all the reasons stated herein, Marc Davis respectfully requests that this Court grant his motion for early termination of supervised release.

Respectfully submitted,

s:/Richard S. Kling

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